

RICHARD H. ROSENBERG
ATTORNEY AT LAW

217 BROADWAY
SUITE 707
NEW YORK, NEW YORK 10007

TEL: 212-586-3838
FAX: 212-962-5037
richrosenberg@msn.com

MEMO ENDORSED

November 16, 2023

Hon. Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Ying Sun et al.
21-CR-343 (SHS)

Dear Judge Stein:

On behalf of **Jian Wang**, a defendant in the above-captioned case, I respectfully write to request a third adjournment of the scheduled December 4, 2023, sentencing hearing. I make this request to permit Mr. Wang to complete additional medical tests and to receive treatment for diagnosed gallbladder stones.

Since I last wrote to the Court, Mr. Wang has been diagnosed with gallbladder stones. His primary care physician advised that they should be removed but believes it appropriate to wait for three months (until February 2024) and perform additional blood tests before scheduling the surgery. Mr. Wang experiences constant pain in his right side (front and back) and his doctor has requested an additional sonogram. In addition, his diabetes has gotten worse. His right knee and foot hurt when he walks, and his left eye is swollen and blurry. All of these symptoms are attributed to his diabetes, which is not currently well controlled. Finally, he is awaiting the urology evaluation that we referenced in our letter September to the Court (Dkt. #240).

At Mr. Wang's request, the Defense asks the Court to adjourn his sentencing until the treatment for his gallbladder stones is complete. Mr. Wang would be grateful for an adjournment that would let him be treated by the doctor with whom he is familiar, and who is familiar with his medical history. An adjournment would also be helpful to Mr. Wang to the extent it would give him time to try different strategies for bringing his diabetes back under control.

Mr. Wang was arrested in the Central District of California on September 27, 2021, and released. On November 4, 2021, he appeared in the Southern District of New York and remained at liberty with a \$125,000 personal recognizance bond signed by two financially responsible persons, travel restrictions, and pretrial supervision in California. He is working and in compliance with these conditions.

I have confirmed that the Government does not object to this request.

Thank you for your consideration and courtesies to counsel.

Respectfully submitted,

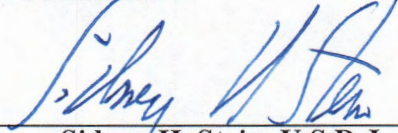
/s/
Richard H. Rosenberg, Esq.

Cc: All counsel (by ECF)
United States Pretrial Officer Megan Henriquez (by email)

The sentencing is adjourned to February 8, 2024, at 2:30 p.m. The defense submission is due by January 18, 2024, the government submission is due by February 1, 2024.

**Dated: New York, New York
November 17, 2023**

SO ORDERED:



Sidney H. Stein, U.S.D.J.